

**IN THE US DISTRICT COURT OF THE STATE OF TENNESSEE  
AT MEMPHIS**

**MIKE PARSONS**  
**Plaintiff,**

V.

**BARRY LAXTON,  
JOHN & JANE DOE 1-99  
Defendants**

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No. \_\_\_\_\_

## JURY TRIAL DEMANDED

**MOTION TO PROCEED IN FORMA PAUPERIS**

Comes Now, Mike Parsons, and moves this honorable court to allow appellant to proceed in forma pauperis.

Whereas, the downturn in the economy and crash in the housing market has resulted in the professional home inspection business operated by Mike Parsons to drop by more than 75%. As shown by Appellant's Uniform Civil Affidavit of Indigency, Mikes contracts for advertising, insurance, phones, internet and many other expenses along with expenses incurred by the tornado that hit our home on February 05, 2008 has consumed ~~Appellant's~~ <sup>PLAINTIFF'S</sup> recourses.

Therefore, ~~Appellate~~<sup>PLAINTIFF</sup> is unable to bare the expense of this action and therefore, move this court to allow ~~Appellate~~<sup>PLAINTIFF</sup> to proceed in forma pauperis.

RESPECTFULLY SUBMITTED this 24<sup>TH</sup> day of September, 2008.

**Mike Parsons, Pres**  
**P.O. BOX 655**  
**Arlington Tennessee 38002**  
**901-353-6453**

1. Full Name(s): Mike Parsons
2. Address(s): P.O. Box 655 Arlington Tennessee 38002
3. Telephone Number(s): 901-353-6453
4. Date(s) of Birth: 05/05/1961
5. Name and Ages of all Dependents: Pat Parsons

6. I am self employed as: A Professional Home Inspector.

My employment address is: P.O. Box 655 Arlington Tennessee 38002

My employment phone number is: 901-353-6453

My total income from January 01, 2008 to date is \$4030.00 or /12

= \$336.00 monthly. Federal income and social security taxes are not deducted from the \$4030.00.

My wife Pat's present monthly income, after federal income and social security taxes are deducted, is: \$ 3,533.00. Our combined monthly income is \$3869.00 but this does not include any deduction for taxes for Mike's income.

7. We receive or expect to receive money from the following sources:

AFDC: \$ None per month beginning \_\_\_\_\_

SSI: \$ None per month beginning \_\_\_\_\_

Retirement: \$ None per month beginning \_\_\_\_\_

Disability: \$ None per month beginning \_\_\_\_\_

Unemployment: \$ None per month beginning \_\_\_\_\_

Workers Compensation: \$ None per month beginning \_\_\_\_\_

Others: \$ None per month beginning \_\_\_\_\_

8. My expenses are:

Rent/House Payment: \$ 1330.18 per month

Groceries: \$ 750.00 per month

Electricity: \$ 250.00 per month

2.

Water:	\$ <u>40.00</u> per month
Gasoline:	\$ <u>600.00</u> per month
Car Note:	\$ <u>394.00</u> per month
Medical & Dental:	\$ <u>335.00</u> per month
Credit Card:	\$ <u>1400.00</u> per month
House Supplies	\$ <u>100.00</u> per month
Clothing:	\$ <u>40.00</u> per month
Telephone:	\$ <u>140.00</u> per month
Internet Web Service:	\$ <u>32.00</u> per month
Car Insurance:	\$ <u>100.00</u> per month
Home owners Insurance:	\$ <u>100.00</u> per month
Business Insurance:	\$ <u>163.00</u> per month
Business Advertising	\$ <u>123.00</u> per month
Credit Cards:	\$ <u>1,200.00</u> per month
Animal Food/Vet/Medication:	\$ <u>1300.00</u> per month

9. Our Assets are:

Automobile:	\$ <u>12,000.00</u> (Fair Market Value)
Automobile:	\$ <u>1,000.00</u> (Fair Market Value)
Checking/Savings Accounts:	\$ <u>1200.00</u> (Paid Bills Pending)
House :	\$ <u>220,000.00</u> (Fair Market Value)
Farm Equipment:	\$ <u>5000.00</u> (Fair Market Value)

3.

Our Debts are:

Amount Owed

To Whom

\$173,000.00 Sovereign Bank, Home Mortgage

\$12,000.00 Memphis Area Teachers Credit Union, Auto Loan

\$60,000.00 Patriot Bank, Home Equity Line of Credit

\$3,300.00 Capitol One & Chase, Credit Card Company

\$5403.00 USAA Savings Bank, Credit Card

\$10,091.00 Navy Federal Credit Union, Credit Card

\$6,389.00 Discover Card, Credit Card

\$16,183.00 Capitol One, Credit Card

I hereby declare under the penalty of perjury that the foregoing answers are true, correct, and complete and that I am financially unable to pay the cost of this action:

Tenn. Const. Art. 1 Sec. 17; That all courts shall be open; and every man, for an injury done him in his lands, goods, person or reputation, shall have remedy by due course of law, and right and justice administered without sale, denial, or delay.

RESPECTFULLY SUBMITTED this 24<sup>th</sup> day of September, 2008.



Mike Parsons, Pro Se  
P.O. BOX 655  
Arlington Tennessee 38002  
901-353-6453

WITNESS MY SIGNATURE on this 24<sup>th</sup> day of Septembet, 2008.

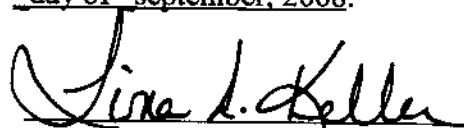
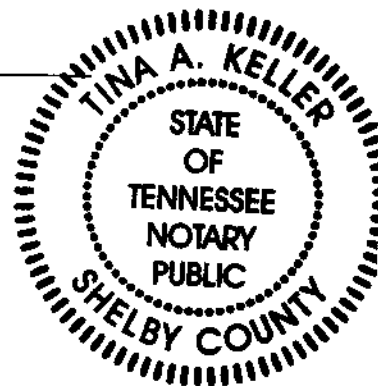
STATE OF TENNESSEE

COUNTY OF \_Shelby\_

Personally appeared before me Mike Parsons,  
With whom I am personally acquainted, and who acknowledged that he  
executed the within instrument for the purposes therein contained.

Witness my hand and official seal at office this 24<sup>th</sup> day of september, 2008.

My Commission Expires: 1-26-2011

  
Notary Public

MY COMMISSION EXPIRES:  
January 26, 2011